

IN THE UNITED STATES DISTRICT COURT FOR  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

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MIGUEL A. RODRIGUEZ,	)	
<i>on behalf of himself and all others</i>	)	
<i>similarly situated,</i>	)	
Plaintiff	)	Civil Action No. 1:14-cv-0 1142 (AJT/TRJ)
v.	)	
	)	
EQUIFAX INFORMATION SERVICES,	)	
LLC,	)	
Defendant.	)	

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**CONSENT MOTION FOR THE ENTRY**  
**OF A STIPULATED PROTECTIVE ORDER**

Defendant, Equifax Information Services, LLC (“Equifax”), by counsel and pursuant to Fed. R. Civ. P. 26(c), respectfully moves the Court for the entry of the attached Stipulated Protective Order and states as follows in support:

1. As stated in their Joint Discovery Plan, the parties agreed that a stipulated protective order should be entered in this case. Certain information to be exchanged in discovery will be confidential and should be handled in a manner to protect its confidentiality.

2. Therefore, the parties submit for the Court’s consideration the proposed Stipulated Protective Order and the proposed Stipulated Protective Order is attached hereto as **Exhibit 1.**

3. As evidenced by the electronic signatures of counsel on the proposed Stipulated Protective Order, Plaintiff Miguel A. Rodriguez and Defendant Equifax Information Services, LLC consent to the relief sought in the motion.

4. Because all of the parties have agreed to the entry of the proposed Stipulated Protective Order, no hearing on this Consent Motion is necessary.

This 20<sup>th</sup> day of February, 2015.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of February, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following;

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